

Attorney Docket No. 40101/07301 (2000.034)

REMARKSRECEIVED
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JUL 22 2008**I. INTRODUCTION**

No new matter has been added. Thus, claims 1, 4-20 and 22-38 remain pending in this application. It is respectfully submitted that based on the following remarks, all of the presently pending claims are in condition for allowance.

II. THE 35 U.S.C. § 102(e) REJECTIONS SHOULD BE WITHDRAWN

Claims 1, 4-20 and 22-38 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2002/0052893 to Grobler et al. (hereinafter "Grobler"). (See 05/22/08 Office Action, p. 2).

Claim 20 recites, "(a) identifying a feature set of a source file; (b) assembling the feature set in a buffer; and (c) writing the feature set into a target file in the target format." The Examiner asserts that the above recitation of claim 20 is taught in Grobler in figures 8 and 9 and paragraphs [0067]-[0069] and [0071]. (See 05/22/08 Office Action, p. 2). Applicant respectfully submits that neither the above referenced portions, nor any other portions, of Grobler teach or suggest the above recitation of claim 20.

The Examiner equates the "assembling the feature set in a buffer," in claim 20, to the temporary storage of the source data in Grobler. However, this is incorrect. Grobler states:

[a]fter the source and target of the import process have been selected in operation 810, the source data selected in operation 810 is handed over to and temporarily stored in temporarily store source data operation 820. Next analyze source data structure operation 830 analyzes the table structure of the temporarily stored source data. Operation 830 parses the source data for tags, which indicate the table structure of the source data.

(See Grobler par. [0063]-[0064]). Grobler takes the source data, and then stores it, in its entirety, in a temporary storage space. After the source data has been moved to the temporary storage space the source data is analyzed for tags. In contrast, claim 20 specifically recites, "(a)

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identifying a feature set of a source file; (b) assembling the feature set in a buffer.” The identifying of the feature set in the source file is done prior to being stored in a buffer. Once the feature set has been identified, the feature set is then moved into a buffer. In Grobler, however, the source data is moved into temporary storage and then analyzed for tags. Therefore, Applicant respectfully submits that Grobler does not teach or suggest the above recitation of claim 20. Thus, Applicant respectfully submits that claim 20 is patentable over Grobler. Because claims 22-33 depend from, and therefore include all the limitations of claim 20, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 20.

Independent claim 34 recites, “(a) providing a feature identifier to determine a feature set of the source file; (b) providing a buffer to assemble the feature set.” Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

Independent claim 35 recites, “a feature identifier to determine a feature set of the source file; a buffer to assemble the feature set.” Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

Independent claim 36 recites, “computer readable program code for identifying a feature set of the source file; computer readable program code for assembling the feature set in a buffer.” Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

Independent claim 37 recites, “computer readable program code for identifying a feature set of the source file; computer readable program code for assembling the feature set in a buffer.” Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.

Independent claim 1 recites, “a feature identifier to determine a feature set of the source file; a buffer to assemble the feature set.” Applicant respectfully submits that this claim is also

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allowable for at least the same reasons stated above with respect to claim 20. Because claims 4-19 depend from, and therefore include all the limitations of claim 1, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 1.

Independent claim 38 recites, "a feature identifier having a front-end lookup table to map MIF code fragments of the source file to a list of features to determine a feature set of the source file; a buffer to store and assemble the feature set; computer readable program code for assembling the feature set in a buffer." Applicant respectfully submits that this claim is also allowable for at least the same reasons stated above with respect to claim 20.


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CONCLUSION

In view of the above remarks, it is respectfully submitted that all the presently pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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